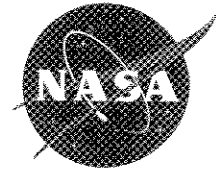


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



August 23, 2010

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the American Institute of Aeronautics and Astronautics (AIAA) Space 2010 Conference Chairmen's Dinner on August 30, 2010

On August 30, 2010, the American Institute of Aeronautics and Astronautics (AIAA), a non-profit organization under 501(c)(3) and co-sponsors, Jet Propulsion Laboratory, U. S. Air Force Space and Missile Systems Center, Lockheed Martin Corporation, and the Boeing Company, will host a dinner and reception at 6:30 p.m., at the Nixon Presidential Library, in Yorba Linda, California.

Approximately 200 individuals have been invited to attend the reception and dinner. Attendees will include NASA and other government personnel, and also aerospace leaders from the military, industry, academia, and other non-profit organizations. The estimated cost of the reception and dinner, which includes all food and beverages is \$150.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). There is an Agency interest in having NASA personnel attend the event as NASA attendees will be able to discuss NASA's projects and plans with individuals from various other sectors. Accordingly, NASA invitees may attend the event without charge.

However, NASA employees whose duties may substantially affect the event sponsors or a majority of its members such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the refreshments they consume at the dinner and reception.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion. NASA invitees should not accept any gift items distributed at the reception which exceed the \$20 cap. NASA invitees who are required to sign the ethics pledge may only receive such gifts if they reimburse the sponsors the fair market value.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', written in a cursive style.

Adam F. Greenstone